

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF NEW YORK;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF
ARIZONA; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE
OF CONNECTICUT; STATE OF
DELAWARE; DISTRICT OF COLUMBIA;
STATE OF ILLINOIS; STATE OF MAINE;
STATE OF MARYLAND; THE
PEOPLE OF THE STATE OF MICHIGAN;
STATE OF MINNESOTA; STATE OF NEW
JERSEY; STATE OF NEW MEXICO;
STATE OF OREGON; STATE OF RHODE
ISLAND; and STATE OF WASHINGTON,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States; UNITED
STATES OF AMERICA; DEPARTMENT
OF THE INTERIOR; DOUGLAS
BURGUM, Secretary of the Interior, in his
official capacity; BUREAU OF OCEAN
ENERGY MANAGEMENT; WALTER
CRUICKSHANK, Acting Director of Bureau
of Ocean Energy Management, in his official
capacity; BUREAU OF LAND
MANAGEMENT; JONATHAN RABY,
State Director of the Bureau of Land
Management, in his official capacity;
UNITED STATES FISH AND WILDLIFE
SERVICE; PAUL SOUZA, Regional
Director of the United States Fish and
Wildlife Service, in his official capacity;
DEPARTMENT OF COMMERCE;
HOWARD LUTNICK, Secretary of
Commerce, in his official capacity;
NATIONAL OCEANIC AND
ATMOSPHERIC ADMINISTRATION;
LAURA GRIMM, Chief of Staff of the
National Oceanic and Atmospheric
Administration, in her official capacity;

Civil Action No. 1:25-cv-11221

NATIONAL MARINE FISHERIES SERVICE; EUGENIO PIÑEIRO SOLER, Director of the National Marine Fisheries Service, in his official capacity; UNITED STATES ARMY CORPS OF ENGINEERS; LIEUTENANT GENERAL WILLIAM H. “BUTCH” GRAHAM, JR., Chief of Engineers for the United States Army Corps of Engineers, in his official capacity; ENVIRONMENTAL PROTECTION AGENCY; LEE ZELDIN, Administrator of Environmental Protection Agency, in his official capacity; DEPARTMENT OF AGRICULTURE; BROOKE ROLLINS, Secretary of Agriculture, in her official capacity; DEPARTMENT OF ENERGY; CHRIS WRIGHT, Secretary of Energy, in his official capacity; DEPARTMENT OF THE TREASURY; and SCOTT BESSANT, Secretary of the Treasury, in his official capacity,

Defendants.

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTIONS FOR PRELIMINARY INJUNCTION AND FOR ENLARGEMENT OF PAGE LIMITATION WITH MEMORANDUM OF REASONS

Federal Defendants respectfully move the Court for a four-week extension of the response time provided in Local Rule 7.1 (b)(2) to allow Defendants six weeks to respond to Plaintiffs’ and proposed Intervenor Alliance for Clean Energy New York’s (ACE NY) voluminous filings in support of their motions for preliminary injunctive relief. Additionally, Defendants request a 30-page enlargement of the page limit provided in Local Rule 7.1 (b)(4) to allow Defendants a total of 50 pages to present a consolidated response to Plaintiffs’ and ACE NY’s motions. Plaintiffs and ACE NY oppose Defendants’ time extension request but do not oppose Defendants’ page enlargement request.

Defendants have prepared an attached proposed order and forthcoming memorandum in support and respectfully request expedited consideration of this Motion.

Respectfully submitted this 14th day of May 2025.

ADAM R. F. GUSTAFSON

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U.S. Department of Justice
Environment & Natural Resources Division

/s/ Michael K. Robertson

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